



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

March 22, 2021

Mr. Robert P. Gordon
Site Manager
U.S. Department of Energy
53 Bell Ave, Building 464
Upton, New York 11973-5000

RE: Justification for Proposed PFOS/PFOA and 1,4-Dioxane Areas of Concern

Dear Mr. Gordon:

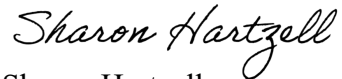
This letter provides a response to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) framework for addressing perfluorooctanoic acid (PFOA), perfluorooctane sulfonate (PFOS), and 1,4-dioxane at Brookhaven National Laboratory (BNL). We have considered BNL's proposed approach and are supportive of moving forward with addressing each category of emerging contaminant as separate Areas of Concern (AOC), as laid out in the Justification document provided February 23, 2021.

While we agree with the AOCs as laid out, we are curious to hear BNL's rationale for not establishing two separate Operable Units (OUs), one for PFOA/PFOS and one for 1,4-dioxane, and rather combining them under one OU. EPA anticipates that addressing 1,4-dioxane may be more difficult at the site than addressing perfluoroalkylated substances (PFAS) given contaminant distribution patterns, and that therefore the AOCs may proceed at different paces. In BNL's estimation and planning, will the planned single OU yield one Record of Decision covering all emerging contaminants, or two separate documents, one for PFAS and one for 1,4-dioxane?

EPA also notes that we would like to see individual figures for each area with the potential groundwater results, in addition to the overall figure provided. Larger individual figures will help if this is a document to be included in the Administrative Record. We also note the present lack of soil data and potential pathways, which will need to be captured in the conceptual site model going forward.

The EPA team looks forward to hearing your responses to the above issues, as we move along the path forward to addressing PFAS and 1,4-dioxane at BNL. Please contact me at (607) 427-2843 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Hartzell".

Sharon Hartzell
Remedial Project Manager, USEPA Region 2

cc: G. Granzen, SC-BHSO
M. McCann, GC-BHSO
S. Coleman, BSA
W. Dorsch, BSA
R. Howe, BSA
J. Remien, BSA
A. Troutman, BSA
D. Pocze, EPA
J. Swartwout, NYSDEC
T. Papura, NYSDEC
D. O'Hehir, NYSDOH
M. Soucie, NYSDOH
S. Karpinski, NYSDOH
C. Costello, NYSDOH
A. Juchatz, SCDHS
A. Rapiejko, SCDHS